

**REMARKS**

In accordance with the foregoing, claims 1-4, 7, and 10-11 are amended. Claim 6 is cancelled without prejudice or disclaimer. New claims 12-15 are presented. No new matter is presented in any of the foregoing and, accordingly, approval and entry of the amended and new claims are respectfully requested.

Claims 1-5 and 7-15 are pending and under consideration.

**ITEM 2: OBJECTION TO CLAIMS 7, 10, AND 11 UNDER 37 CFR §1.75(c)**

The Examiner objects to claims 7, 10, and 11 under 37 CFR §1.75(c) as being in improper form because of multiple dependent claim 6. Claim 6 is cancelled herein without prejudice or disclaimer. Claims 7, 10 and 11 are amended herein. Withdrawal of the objection and allowance of the claims is requested.

**ITEMS 4-5: REJECTION OF CLAIMS 1 UNDER 35 U.S.C. §102(b) BY HAIGH (U.S.P. 5,793,861)**

The Examiner rejects claim 1 under 35 U.S.C. §102(b) as being anticipated by Haigh. (Action at pages 2-3).

As provided in MPEP §706.02 entitled Rejection on Prior Art, anticipation requires that the reference must teach every aspect of a claimed invention. Haigh does not support an anticipatory-type rejection by not describing features recited by claim 1.

Applicants submit that the teaching of the features recited by claim 1 are not found in the lines cited by the Examiner, or elsewhere. For example, the Examiner contends that in col. 2, lines 1-10 Haigh teaches "(p)rocess request determination means for determining whether process requests from a plurality of channels are real-time process requests needing processing in real-time, or non-real-time process requests not needing processing in real-time." (Action at page 2).

However, Applicants submit that Haigh does not teach any determination means for determining whether process requests are real-time or non-real-time, as the Examiner contends. Haigh merely teaches (col. 2, lines 1-10):

system 10 is capable of receiving transactions from entities in which the transactions may include electronic mail (E-mail), voice mail, . . .

Further, the Examiner contends that in col. 2, lines 25-27 Haigh teaches "(r)real-time processing allocation means for allocating process requests determined to be real-time process requests to processing terminals currently open among channels capable of said real-time process." (Action at pages 2-3).

However, Applicants submit that Haigh does not teach allocation among channels

capable of real-time, but Haigh merely teaches (col. 2, lines 25-27) "transaction controller 18 processes transactions received and sent through a transaction interface 24."

The Examiner also contends that in col. 2, lines 27-35 Haigh teaches "(n)on-real-time processing administrating means for administrating process requests determined to be said non-real-time process requests, as well as priority levels therefor." (Action at page 3). However, Applicants submit that Haigh does not teach administrating priority levels. Haigh merely teaches (col. 2, lines 27-35) "queue processing order capable of being modified by a supervisor."

The Examiner also contends that in col. 2, lines 34-40 and FIG. 2, Haigh teaches:

non-real-time processing allocation means for allocating non-real-time processes administrated by said non-real-time processing administrating means to any of the processing terminals, said allocation performed with consideration given to the priority level and to suitability of the terminal for handling the process.

(Action at page 3).

However, Haigh does not teach about suitability of a terminal in the cited lines or elsewhere. Haigh's FIG. 2, for example, merely shows "processing transactions" and does not even use term --terminal--.

In addition, claim 1 recites that the process request determination means for accepting process requests from a plurality of channels as communication means between a user and call center, and determining . . . based on a channel type that indicates properties of a channel that generates said process requests. The accepting based on a channel type is not taught by Haigh.

### **Conclusion**

Since Haigh does not teach or suggest features recited in claim 1, the rejection should be withdrawn and claim 1 allowed.

### **ITEMS 4, 6, 7: REJECTION OF CLAIMS 2-3 UNDER 35 U.S.C. §102(b) BY HAIGH**

The Examiner rejects claims 2 and 3 "for similar reasons as" in rejecting claim 1. (Action at page 3).

Independent claim 2 recites a multi-channel processing control method including "determining whether process requests generated from a plurality of channels are real-time process requests needing processing in real-time, or non-real-time process requests not needing processing in real-time; determining whether said process request is a real-time process request and allocating those real-time process requests to processing terminals currently open among channels capable of said real-time process. . ." Dependent claim 3 recites "allocating a non-real-time process request currently being administrated to a most

appropriate processing terminal, based on the priority level of the request and suitability of open processing terminals capable of processing said non-real-time process request."

As discussed above Haigh does not teach, in lines cited by the Examiner or elsewhere, features as recited by claims 2-3 including determining whether process requests generated from a plurality of channels are real-time process requests needing processing in real-time. In addition, as discussed above Haigh also does not teach allocating real-time process requests to terminals currently open among channels capable of a real-time process.

### **Conclusion**

Since Haigh does not describe features recited in claims 2 and 3, the rejection should be withdrawn and the claims allowed.

### **ITEMS 4, 8-9: REJECTION OF CLAIMS 8 AND 9 UNDER 35 U.S.C. §102(b) BY HAIGH**

The Examiner rejects claims 8 and 9 contending that Haigh teaches "a recording medium on which is recorded a program for multi-channel control method," and "a transmission medium transmitting a program for the multi-channel control method," respectively. (Action at page 3).

While Haigh does teach a recording medium and a transmission medium, Applicants submit that the mediums taught by Haigh do not teach control method features recited by claim 8 or claim 9.

Claim 8 recites a recording medium on which is recorded a program, and claim 9 recites a transmission medium transmitting a program, for "determining whether process requests generated from a plurality of channels are real-time process requests needing processing in real-time, or non-real-time process requests not needing processing in real-time . . ." Haigh does not teach determining whether requests are real-time process requests, for example.

### **Conclusion**

Since features of claims 8 and 9 are not taught by Haigh, the rejection should be withdrawn and the allowed.

### **ITEMS 10-12,14: REJECTION OF CLAIMS 4-5, and 7 UNDER 35 U.S.C. §102(b) BY STENT ET AL. (U.S.P. 5,586,179)**

The Examiner rejects independent claim 4 (and dependent claims 5 and 7) under 35 U.S.C. §102(b) as anticipated by Stent. (Action at pages 3-4).

Independent claim 4, as amended, recites a multi-channel processing control method for processing terminals handled by operators including "allocating the processing terminal handled by said dual-duty operator to either incoming tasks or outgoing tasks based on a current status of the processing terminals handled by the operators wherein said incoming tasks and outgoing tasks include process requests arising from channels including, in addition to the processing

terminals handled by said operators, Web agents handling process requests generated by Internet web servers, e-mail agents handling process requests generated by e-mail servers."

Applicants submit that Stent does not teach a system that handles various channels such as e-mail servers as recited in claim 4. Stent merely teaches (col. 4, lines 49-55):

... according to the present invention integrates outbound telephone calling and system control to an existing inbound telephone system.

Stent's FIG. 2 merely shows (col. 4, lines 32-35) "a prior art system which is added and integrated with an existing telephone system."

### **Conclusion**

Since features of independent claim 4 (and claims 5 and 7 dependent thereon) are not taught by Stent, the rejection should be withdrawn and the claims allowed.

### **ITEMS 10, 15, 16: REJECTION OF CLAIMS 10-11 UNDER 35 U.S.C. §102(b) BY STENT**

The Examiner rejects claims 10 and 11 contending that Stent teaches "a recording medium on which is recorded a program for the multi-channel control method (e.g. Figure 4). As per claim 11, it is rejected for similar reasons as stated above." (Action at page 4).

Claim 10 recites a recording medium on which is recorded a program, and claim 11 recites a transmission medium transmitting a program, for a multi-channel control method including "allocating the processing terminal . . . wherein said incoming tasks and outgoing tasks include process requests arising from channels including in addition to the processing terminals handled by said operators, Web agents handling process requests generated by Internet web servers, e-mail agents handling process requests generated by e-mail servers . . .

While Stent does teach a recording and a transmission medium, Applicants submit that such mediums do not teach features of a method including allocating requests arising from channels such as e-mail servers as recited by claims 10 and 11.

### **Conclusion**

Since features of claims 10 and 11 are not taught by Stent, the rejection should be withdrawn and the allowed.

### **NEW CLAIMS**

New claims 12, 13, 14, and 15, are dependent respectively on claims 8, 9, 10, and 11 and patentably distinguish over the cited art for the features recited therein.

### **CONCLUSION**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is

requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: July 29, 2004

By: Paul W. Bobowiec  
Paul W. Bobowiec  
Registration No. 47,431

1201 New York Avenue, NW, Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501